

EXHIBIT G

Sim, Charlie

From: Sim, Charlie
Sent: Wednesday, September 4, 2024 4:42 PM
To: rak_headwater@raklaw.com
Cc: *** GDCVerizon-Headwater; HLVerizon Headwater; [EXT] Dacus, Deron; melissa@gillamsmithlaw.com
Subject: Headwater v. Verizon (-352) & Headwater v. T-Mobile (-377, 379) - Summary of September 4 conference

Counsel,

We write to memorialize the parties' lead-and-local conference earlier today:

Headwater's Motion to Compel – Defendants explained that we intend to collect and produce documents relevant to Headwater's network-side allegations to the extent Defendants are able to understand those allegations. Specifically, Defendants stated that we will collect and produce documents related to Headwater's allegations regarding the 3GPP "attach" message (i.e. the references to 3GPP TS 24.301 in Headwater's contentions), QCI levels, and the components specifically identified in Headwater's cover pleadings, i.e. "FOTA Update Server," "FOTA," and "OTA Server" (for T-Mobile) and "OTADM," "PROPOTA," "VZOTADM," "FOTA," "SDM," and/or "DM" (for Verizon). Defendants expressed a belief that this production would moot Headwater's motion to compel. Headwater disagreed and stated that this production would be insufficient because it purportedly excluded information regarding "PCO" and "Bearer Resource Allocation Requests." Both of those terms appear, in Headwater's contentions, in the context of Headwater's citations to 3GPP TS 24.301. Headwater did not otherwise articulate deficiencies with Defendants' proposed production or why it would not moot Headwater's motion, but confirmed that the parties were at an impasse.

Defendants' Motion to Strike and Compel Supplementation – Headwater explained that its proposed comprise position was already articulated in its opposition to Defendants' motion to strike. Defendants confirmed that Headwater's generalized offered to "further supplement" did not reach the level of relief sought by Defendants' motion. The parties thus confirmed they were at an impasse.

Discovery Topics

Expert Reports from Samsung Litigation – Defendants explained that Samsung has now agreed to cross-production of expert reports from the 22-cv-422 (E.D. Tex.) litigation to both T-Mobile and Verizon. Headwater stated that it believed that it could shortly produce these expert reports and committed to following up with Defendants to confirm. Defendants stressed that the only objection Headwater previously raised to this cross-production was confidentiality of Samsung information, which is now resolved.

Filings from Samsung Litigation – Headwater committed to following up shortly to confirm that it will produce the remaining sealed filings from the docket of the 22-cv-422 (E.D. Tex.) litigation.

Identification of ESI Custodians – The parties discussed beginning the process for identification of ESI custodians and search terms. Defendants committed to investigating further and responding to Headwater early next week.

Headwater's Responses to Defendants' Interrogatory Nos. 6, 17, and 18 – Defendants reiterated that these interrogatories call for a clear narrative response that Headwater has failed to provide. Specifically, Defendants explained that Interrogatory No. 6 calls for a narrative response outlining the facts of each sale or offer for sale by Headwater and any response thereto; Interrogatory No. 17 calls for a chart or narrative explanation of which products purportedly embody which patents in connection with Headwater's allegations of copying; and Interrogatory No. 18 calls for a narrative description of each inventor's individual contribution to each of the Asserted Patents. Headwater committed to supplementing its responses to these interrogatories.

Headwater's Responses to the Remaining Identified Interrogatories – Headwater confirmed that it intended to supplement “most if not all” of its responses to Defendants' Interrogatory Nos. 2, 3, 8, 11, 13, and 15, and committed to following up with Defendants promptly regarding a date for that supplementation.

Best,
Charlie

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